

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**GAIL O'NEIL, as next friend to her
minor daughter** §
Plaintiff, §
§
v. §
§
TEXAS DEPARTMENT §
OF CRIMINAL JUSTICE, *et al.*, §
Defendants. §

Civil Action No. 2:10-CV-3-J

**DEFENDANTS' DHIRAJLAL PATEL, M.D. AND
TEXAS TECH UNIVERSITY HEALTH SCIENCE CENTER'S
DESIGNATION OF EXPERTS**

Come Now **DHIRAJLAL PATEL, M.D. AND TEXAS TECH UNIVERSITY HEALTH
SCIENCE CENTER** (Texas Tech), by and through the Attorney General of Texas, and file this
Defendants' Designation of Experts.

1. Nizam Peerwani, M.D.
Tarrant County Medical Examiners Office
200 Feliks Gwordz Place
Fort Worth, Texas, 76104
817-920-5700

Dr. Peerwani will testify regarding the cause of death of Shermaine Peterson.

2. Dhirajlal Patel, M.D. - Defendant
Texas Tech Health Science Center - Correctional Managed Care
c/o Kim Coogan, AAG
Austin, Texas 78711
512-463-2063

Dr. Patel will testify about the medical care rendered to and cause of death of Shermaine Peterson.

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

BILL COBB
Deputy Attorney General for Civil Litigation

DAVID C. MATTAX
Director of Defense Litigation

DAVID A. TALBOT, JR.
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Chief, Law Enforcement Defense Division

/s/ Kim Coogan
KIM COOGAN
Assistant Attorney General
Attorney-In-Charge
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NOTICE OF ELECTRONIC FILING

I, KIM COOGAN, Assistant Attorney General of Texas, certify that I have electronically submitted for filing a true and correct copy of the above and foregoing **Defendants' Dhirajlal Patel, M.D. and Texas Tech University Health Science Center's Designation of Experts** in accordance with the Electronic Case Files System of the Northern District of Texas on this the 20th day of December, 2010.

/s/ Kim Coogan
KIM COOGAN
Assistant Attorney General

CERTIFICATE OF SERVICE

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the foregoing **Defendants' Dhirajlal Patel, M.D. and Texas Tech University Health Science Center's Designation of Experts** has been served by placing same in the United States Mail, postage prepaid, on this the 20th day of December, 2010 addressed to:

Todd Batson *Via USPS First-Class Mail*
Texas Civil Rights Project
1405 Montopolis Drive
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/s/ Kim Coogan
KIM COOGAN
Assistant Attorney General